

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

NETLIST, INC.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., et al.,

Defendants.

Civil No. 2:22-cv-00293-JRG  
(Lead Case)

**JURY TRIAL DEMANDED**

**SAMSUNG’S OPPOSED MOTION FOR CONTINUANCE**

Defendants Samsung Electronics Co., Ltd.; Samsung Electronics America, Inc.; and Samsung Semiconductor, Inc. (“Samsung”) move for a continuance of the July 23, 2024 pretrial conference and August 19, 2024 trial dates set by the Court on June 12, 2024. Dkt. 711. The newly set dates present a direct conflict with the preexisting trial schedules of Samsung’s trial counsel, including Samsung’s lead trial counsel Ruffin Cordell.<sup>1</sup>

Counsel for Samsung, Ruffin Cordell and Michael McKeon, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

<sup>1</sup>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Mr. Cordell and Mr. McKeon [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

As this Court is aware, Mr. Cordell and Mr. McKeon have been trial counsel for Samsung since the start of the EDTX cases, and are both integral to Samsung's representation. During the *Netlist I* matter (*Netlist Inc. v. Samsung Elecs. Co., Ltd.*, No. 2:21-CV-00463), Mr. Cordell gave opening and closing statements, and both Mr. Cordell and Mr. McKeon conducted significant direct and cross-examinations. [REDACTED]

[REDACTED]

[REDACTED]

In the interest of providing a suitable alternative to the Court, Samsung respectfully submits that its counsel and witnesses are available for a pre-trial conference on July 30 or 31, 2024, and its counsel and witnesses are available to begin trial on September 30, 2024 or October 7, 2024.

Dated: June 17, 2024

Respectfully submitted,

By: /s/ Ruffin B. Cordell

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*Attorneys for Defendants Samsung  
Electronics Co., Ltd.; Samsung Electronics  
America, Inc.; and Samsung Semiconductor,  
Inc.*

[REDACTED]

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on June 17, 2024. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A) and via electronic mail.

/s/ Ruffin B. Cordell

**CERTIFICATE OF CONFERENCE**

I hereby certify that local counsel for the parties met and conferred regarding this motion on June 14, 2024. Plaintiff opposes this motion.

/s/ Ruffin B. Cordell

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]